

ENRON CREDITORS  
RECOVERY CORP., *et al.*,  
Reorganized Debtors,  
By Special Litigation Counsel,  
CROWELL & MORING LLP  
153 East 53rd Street  
New York, New York 10022  
(212) 223-4000  
William J. McSherry, Jr. (WM-1194)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re**

**ENRON CREDITORS**  
**RECOVERY CORP., *et al.*,**  
**Reorganized Debtors.**

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**ENRON CREDITORS**  
**RECOVERY CORP., *et al.*,**  
**Plaintiffs,**

**v.**

**CITIGROUP INC., *et al.*,**  
**Defendants.**

Case No. 07 CV 10612

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

**Bankruptcy Case  
No. 01-16034 (AJG)**

**Adversary Proceeding  
No. 03-09266 (AJG)**

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PURSUANT TO LOCAL RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern District of New York, I, William J. McSherry, Jr., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Matthew C. Heyn  
Klee, Tuchin, Bogdanoff & Stern, LLP  
1999 Avenue of the Stars, 39<sup>th</sup> Floor  
Los Angeles, CA 90067  
(310) 407-1000  
(310) 407-9090

MATTHEW C. HEYN is a member in good standing of the Bar of the State of California.

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There are no pending disciplinary proceeding against MATTHEW C. HEYN in any State or Federal court.

Dated: December \_\_\_, 2007

New York, New York

Respectfully submitted,



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WILLIAM J. McSHERRY, JR. (WM-1194)  
CROWELL & MORING  
153 East 53rd Street  
New York, New York 10022  
(212) 223-4000  
(212) 895-4201

ENRON CREDITORS  
 RECOVERY CORP., *et al.*,  
 Reorganized Debtors,  
 By Special Litigation Counsel,  
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 153 East 53rd Street  
 New York, New York 10022  
 (212) 223-4000  
 William J. McSherry, Jr. (WM-1194)

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK**

	X
<b>In re</b>	:
<b>ENRON CREDITORS</b>	:
<b>RECOVERY CORP., <i>et al.</i>,</b>	:
<b>Reorganized Debtors.</b>	:
	x
<b>ENRON CREDITORS</b>	:
<b>RECOVERY CORP., <i>et al.</i>,</b>	:
<b>Plaintiffs,</b>	:
<b>v.</b>	:
<b>CITIGROUP INC., <i>et al.</i>,</b>	:
<b>Defendants.</b>	:
	x

STATE OF NEW YORK      )  
                             )      ss:  
 CITY OF NEW YORK      )

William J. McSherry, Jr., being duly sworn, hereby deposes and says as follows:

1. I am a partner at Crowell & Moring, counsel for Debtor in the above captioned action. I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of the motion of the Debtor's motion to admit Matthew C. Heyn as counsel pro hac vice to represent Debtor in this matter.

**Case No. 07 CV 10612**

**AFFIDAVIT OF WILLIAM J.  
 MCSHERRY, JR., IN SUPPORT  
 OF MOTION TO ADMIT  
 COUNSEL PRO HAC VICE**

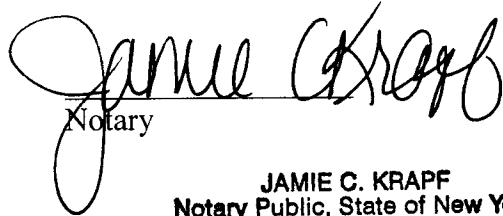
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2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February 1974. I am also admitted to the bar of the United States District Court of the Southern District of New York, and am in good standing with this Court.
3. I have known Matthew C. Heyn for one-half year.
4. Mr. Heyn is an associate at Klee, Tuchin, Bogdanoff & Stern, LLP, in Los Angeles, California.
5. I have found Mr. Heyn to be both a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Matthew C. Heyn, pro hac vice, to this Court.
7. I respectfully submit a proposed order granting the admission of Matthew C. Heyn, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Matthew C. Heyn, pro hac vice, to represent the Debtor in the above captioned matter, be granted.

Sworn to before me this 10<sup>th</sup>  
Day of December, 2007

  
Notary

JAMIE C. KRAPF  
Notary Public, State of New York  
No. 02KR6154451  
Qualified in Nassau County  
Commission Expires 10/23/2010

  
WILLIAM J. McSHERRY, JR.



**THE STATE BAR  
OF CALIFORNIA**

**MEMBER SERVICES CENTER**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

December 10, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MATTHEW CHRISTOPHER HEYN, #227474 was admitted to the practice of law in this state by the Supreme Court of California on December 4, 2003; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink that reads "J. Robert McPhail".

J. Robert McPhail  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re :  
ENRON CREDITORS :  
RECOVERY CORP., *et al.*, :  
Reorganized Debtors. :  

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ENRON CREDITORS :  
RECOVERY CORP., *et al.*, :  
Plaintiffs, :  
v. :  
CITIGROUP INC., *et al.*, :  
Defendants. :  

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Case No. 07 CV 10612

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

**Bankruptcy Case  
No. 01-16034 (AJG)**

**Adversary Proceeding  
No. 03-09266 (AJG)**

Upon the motion of William J. McSherry, Jr., attorney for Enron Creditors Recovery Corporation, et al., and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Matthew C. Heyn  
Klee Tuchen Bogdanoff & Stern LLP  
1999 Avenue of the Stars, 39<sup>th</sup> Floor  
Los Angeles, California 90067  
Telephone: (310) 407-4000  
Fax: (310) 407-9090  
MHeyn@ktbslaw.com

is admitted to practice pro hac vice as counsel for Enron Creditors Recovery Corporation, et al., in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing the discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: December \_\_, 2007  
New York, New York

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United States District Judge

ENRON CREDITORS  
 RECOVERY CORP., *et al.*,  
 Reorganized Debtors,  
 By Special Litigation Counsel,  
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 153 East 53rd Street  
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**UNITED STATES DISTRICT COURT  
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ENRON CREDITORS	:
RECOVERY CORP., <i>et al.</i> ,	:
Plaintiffs,	:
v.	:
CITIGROUP INC., <i>et al.</i> ,	:
	:
Defendants.	:
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**Case No. 07 CV 10612**

**CERTIFICATE OF SERVICE**

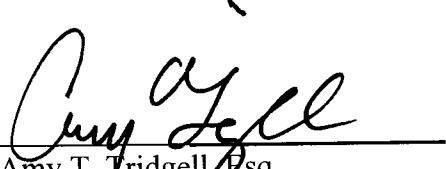
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of December 2007, I caused true and correct copies of the foregoing (i) Motion to Admit Counsel Pro Hac Vice; (ii) Affidavit of William J. McSherry, Jr. in Support of Motion to Admit Counsel Pro Hac Vice; (iii) Certificate of Good Standing for Matthew C. Heyn, Esq.; and (iv) a proposed Order for Admission of Counsel Pro Hac Vice to be served on counsel of record by hand delivery and on counsel of record for Delta

in Philadelphia, Pennsylvania by via overnight U.S. mail, postage prepaid, return receipt requested.



Amy T. Tridgell, Esq.  
Crowell & Moring  
153 East 53<sup>rd</sup> Street  
New York, New York 10022